

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

AMPEX CORPORATION,

Plaintiff,

V.

C.A. No. 04-1373-KAJ

EASTMAN KODAK COMPANY,
ALTEK CORPORATION and CHINON
INDUSTRIES, INC.,

Defendants.

DEFENDANTS' MOTION TO DISQUALIFY ERIC ANDERSON AS AN EXPERT WITNESS

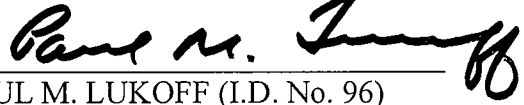
Defendants Eastman Kodak and Altek Corporation hereby move, pursuant to the Protective Order in this case, entered Nov. 1, 2005, to disqualify Eric Anderson from serving as an expert witness in this action.

During the course of a confidential relationship with Eastman Kodak Company (“Kodak”) between 1993 and 2000, Mr. Anderson not only received confidential information relevant to this litigation, but in fact helped to design the Kodak digital camera technology at issue in this litigation. There are many other potential experts available – Ampex has no need to use one of the few who actually helped Kodak to design the technology at issue. Ampex’s use of Mr. Anderson would unfairly prejudice Kodak and unjustly award Ampex for selecting an expert with a conflict of interest.

Accordingly, Defendants respectfully move to disqualify Mr. Anderson. In support of this motion, Defendants submit Defendant's Opening Brief In Support of Their Motion to Disqualify Eric Anderson as an Expert and related appendices.

Pursuant to Local Rule 7.1.1, defense counsel has made a reasonable effort to reach an agreement with opposing counsel concerning the subject of this motion, without success.

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CERTIFICATE OF SERVICE

I hereby certify that on March 6, 2006, I electronically filed **DEFENDANTS' MOTION TO DISQUALIFY ERIC ANDERSON AS AN EXPERT WITNESS** with the Clerk of the Court using CM/ECF which will send notification of such filing to the following:

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I hereby certify that on March 6, 2006, I have forwarded the above-noted document to the following as noted below:

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